

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

Luis Angel Alvarez-Alvarez

Case No. Case: 2:25-mj-30064
Assigned To : Unassigned
Assign. Date : 2/12/2025
Description: CMP USA V. LUIS
ANGEL ALVAREZ-ALVAREZ
(DA)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 5/10/2024-2/10/2025 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 2251(a)

Sexual exploitation of children

18 U.S.C. § 2252A(a)(5)(B)

Possession of child pornography

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: Feb. 12, 2025

City and state: Detroit, Michigan



Complainant's signature

Dave Alley, Special Agent - HSI

Printed name and title



Judge's signature

Honorable Elizabeth Stafford, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR AN ARREST WARRANT**

I, David M Alley, being first duly sworn, state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with Homeland Security Investigations (HSI), of the United States Department of Homeland Security (DHS). I am assigned to the Special Agent in Charge (SAC), Office of Investigations (OI) with offices located at 477 Michigan Ave., Suite 1850, Detroit, Mich. I have been employed with HSI since March 2007. I have successfully completed the Criminal Investigator Training Program and the Immigration and Customs Enforcement Special Agent Training Program at the Federal Law Enforcement Training Center in Glynco, Ga. I have received bachelor's and master's degrees in criminal justice from Michigan State University. I have successfully completed the Basic Computer Evidence Recovery Training (BCERT) at FLETC, Advanced Computer Evidence Recovery Training (ACERT) at the HSI Cyber Crimes Center and the Cyber Crime Center Mobile and Cellular Device Data Extraction course. I possess an A+ certification and a GIAC Advanced Smartphone Forensics (GASF) certification. While employed by HSI, I have investigated federal criminal violations related to child exploitation and child pornography. I have gained experience through training and everyday work relating to conducting these types of investigations. I have received training in child pornography and child exploitation and have had the opportunity

to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media.

2. This affidavit is made in support of a criminal complaint and arrest warrant for Luis Angel Alvarez-Alvarez (DOB XX/XX/2002) for violations of 18 U.S.C §§ 2251(a) (sexual exploitation of a minor) and 2252A(a)(5)(B) (possession of child pornography).

3. This affidavit is based on my personal knowledge, experience, and training, as well as on information obtained by me through investigative observations and conversations with other HSI agents and agents from other law enforcement agencies. This affidavit does not set forth every fact resulting from this investigation; rather, it contains a summary of the investigation to date for the limited purpose of establishing probable cause to obtain an arrest warrant for Luis Angel Alvarez-Alvarez.

PROBABLE CAUSE

4. On February 10, 2025, at approximately 8:30 p.m., a Border Patrol Agent in a marked Border Patrol Unit vehicle stopped a silver Kia vehicle that was being operated without a license plate on West Jefferson Road in River Rouge, Michigan. During the subsequent encounter, the Agent identified the sole occupant of the vehicle, Luis Angel Alvarez-Alvarez (DOB xx/xx/2002), a citizen of Venezuela. The Agent also determined that an order of removal had been

previously entered against Alvarez-Alvarez on December 13, 2024, and Alvarez-Alvarez was transported to CBP's Gibraltar Station for processing.

5. Alvarez-Alvarez was in possession of an Apple iPhone cellular phone at the time of his apprehension. Alvarez-Alvarez signed a consent form in Spanish, allowing Agents to search his phone. Border Patrol Agents observed images and videos that involved a nude toddler or a toddler's penis and contacted Homeland Security Investigations for assistance.

6. On February 11, 2025, I responded to Gibraltar Station and conducted a preview of Alvarez-Alvarez's iPhone. I observed, among other things:

- a. A 42-second video with a date of May 10, 2024. This video depicts a nude, male, toddler-aged minor (hereafter Minor Victim 1 or MV-1) touching and/or rubbing his bare penis. An unknown person is then heard laughing, and an adult hand moves the child's hand away from his penis and then the adult hand touches and manipulates the child's penis. The child begins to rub his penis again and the unknown person is again heard laughing as an adult hand appears to reach for and rub the child's penis again while the child laughs.
- b. A 15-second video with a date of June 8, 2024. This video depicts a nude, male, toddler-aged child in a bed. This toddler appears to be MV-1. MV-1 is observed reaching between his legs and touching and

rubbing his bare penis with his hand. At the end of the video, the camera pans to the face of an adult male lying next to MV-1. This male appears to be Alvarez-Alvaraz.

- c. A 13-second video with a date of November 24, 2024. This video depicts a sleeping toddler in a shirt and a diaper. This child appears to be MV-1. The camera gets closer to the child's bottom and a hand is observed partially pulling the diaper aside. The child's genitals are not visible.
- d. An image dated November 26, 2024. This image depicts a prepubescent male nude from the waist down. The child's penis is visible.
- e. I observed the following videos that depict MV-1 nude in the shower, with his penis visible: A 6-second video with a date of February 6, 2025, a 12-second video with a date of February 5, 2025, an 11-second video with a date of November 20, 2024, and a 33-second video with a date of November 7, 2024.

CONCLUSION

7. I respectfully submit that there is probable cause to believe that Luis Angel Alvarez-Alvarez has committed violations of 18 U.S.C §§ 2251(a) (sexual exploitation of a minor) and 2252A(a)(5)(B) (possession of child pornography). I request that the Court authorize the issuance of a criminal complaint and arrest warrant for Luis Angel Alvarez-Alvarez.

Respectfully submitted,



David M. Alley
Special Agent
Homeland Security Investigations

Sworn to before me in my presence
and/or by reliable electronic means.



Hon. Elizabeth Stafford
United States Magistrate Judge

Date: February 12, 2025